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ALAN J. BARATZ
Member of the Firm

November 29, 2021

VIA E-mail:

The Honorable Jessica S. Allen, U.S.M.J.
US Courthouse
50 Walnut Street, PO Box 999
Newark, New Jersey 07101-0999

Re: Ortiz v. Township of Woodbridge et al.
Civil Action No: 19-cv-14139
Woodbridge Claim No: 2019153406
DOL: June 21, 2018
Our File No: 88742

Dear Judge Allen:

Our firm represents defendants, Township of Woodbridge, Captain Roy Hoppock, Police Director Robert Hubner, and Deputy Police Director Joseph Niesky in the above referenced matter, which was most recently the subject of a Status Teleconference that Your Honor conducted with all counsel on October 26, 2021. Your Honor has scheduled another Status Conference in the matter for December 10, 2021 at 10:30 a.m. I offer this correspondence to address the status of issues regarding paper discovery as between plaintiff and all Township of Woodbridge defendants as Your Honor with consent of all counsel did partially lift the previously entered stay of discovery concerning only the exchange of paper discovery as among plaintiff and the Woodbridge Township defendants.

Counsel for the Woodbridge Township officers, including Detective Brian Jermenczak, Detective Shayne Bodnar, Detective Patrick Harris, Detective Nicole Hubner, Detective Juan Carlos Bonilla, Jr., and Patrolman Geian Rastearpanah is currently owed from plaintiff executed HIPAA-compliant Authorizations addressed to any of the female plaintiff's primary care physicians, or plaintiff's sworn representation that prior to June 21, 2018 she did not have any primary care physician.

As concerns the Township of Woodbridge, Captain Hoppock, Director Hubner and Deputy Director Niesky, I do not believe that there is any paper discovery outstanding from plaintiffs to my clients in the matter.

As concerns plaintiff, I received from Ms. Zammitti-Shaw a November 2, 2021 letter in which she referenced that she had received answers of my individually named clients, but had not received responses of defendant, Township of Woodbridge to a set of Revised Interrogatories that I agreed to have the Township of Woodbridge answer. Upon review of my file, I noted that on November 11, 2020 I had sent Ms. Zammitti-Shaw a copy of the Township's answers to plaintiff's revised Interrogatories certified by Captain Scott Kuzma with numerous exhibits, and

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this day I sent counsel a letter in response to her November 2, 2021 correspondence with copies of my November 11, 2020 correspondence and the Township's certified answers to plaintiff's Revised Interrogatories. I therefore believe that the Township of Woodbridge, Captain Hoppock, Director Hubner and Deputy Director Niesky have met all of their written discovery obligations to plaintiff in the matter.

Thank you.

Respectfully yours,

WEINER LAW GROUP LLP

Alan J. Baratz

By: _____

Alan J. Baratz
A Member of the Firm

AJB:tb

cc: Natalie Zammitti-Shaw, Esq. (via e-mail)
Marc D. Morey, Esq. (via e-mail)
Ashley L. Costello, DAG (via e-mail)
Susan Lovett, Qual-Lynx (via e-mail)
Jeremy Solomon, Lit. Coord. (via e-mail)

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